

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

GERMAN JOSETH TORRES LIZAMA,
a/k/a “Duende,”
a/k/a “Terrorista,”

Defendant.

Case No. 1:25-cr-211

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Jason Whitaker, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since October 2005. I am currently assigned to a squad operating out of the FBI’s Washington Field Office that investigates criminal offenses related to gangs, firearms, drugs, and violent crimes.

2. As an FBI Special Agent, I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in, among others, 18 U.S.C. § 922.

3. I have specialized training and experience in the areas of criminal activity involving narcotics, gangs, and firearms, interview and interrogation techniques, evidence recovery, source recruitment, arrest procedures, search and seizure, and cellular phone analysis. Since joining my current unit in November 2021, I have investigated violent gang-related activity and firearm and

drug trafficking, arrested those who have engaged in such unlawful activity, and seized controlled substances and firearms, as well as property and assets derived from or used in committing such offenses. I have been involved in approximately eight investigations of MS-13, as a lead agent or assisting other agents, all of which involved one or more murders or other violent crimes. These investigations also involved firearms and narcotics trafficking or possession and extortion.

4. I submit this affidavit in support of a criminal complaint and arrest warrant charging GERMAN JOSETH TORRES LIZAMA, a/k/a “Duende,” a/k/a “Terrorista,” (“TORRES LIZAMA”), with unlawful possession of ammunition by an illegal alien, in violation of 18 U.S.C. § 922(g)(5)(a).

5. The facts and information contained in this affidavit are based upon my personal knowledge, training, and experience, as well as information and evidence obtained from witnesses and other law enforcement officials. All observations that I did not personally make were relayed to me by the individuals who made them or come from my review of records, documents, and other physical evidence obtained during this investigation.

6. This affidavit contains information necessary to support probable cause for this application. It is not intended to include each and every fact and matter observed by me or known to the United States. Accordingly, where I refer to conversations and events, I refer to them in substance and in relevant part rather than in their entirety or verbatim, unless otherwise noted. This affidavit also reflects my current understanding of facts relating to this investigation, but my understanding may change in the future as the investigation proceeds.

PROBABLE CAUSE

The July 18, 2024, Murder of A.P.

7. Or about July 18, 2024, at approximately 8:23 p.m., the Prince William County Police Department (“PWCPD”) received a 911 call from a caller who reported that gunshots were fired in the vicinity of 10704 Pineview Road in Manassas, Virginia (“the Pineview residence”), within the Eastern District of Virginia. The caller reported seeing a body in the woods in front of the same residence.

8. Upon arriving at the Pineview residence, responding PWCPD officers observed a female victim, later identified as 18-year-old A.P., on the ground in a wooded area next to the driveway. A.P., who had sustained multiple gunshot wounds to her head, was pronounced dead at the scene.

9. The Commonwealth of Virginia’s Office of the Chief Medical Examiner conducted an autopsy on A.P. and determined the manner of death to be homicide, with gunshot wounds to her head and torso being the cause of death.

10. Police recovered \$200 from A.P.’s left hand and a blue iPhone from her back pocket. Police also recovered two Blazer .9mm Luger cartridge casings and a Winchester .9mm Luger cartridge casing from the scene.

11. Police spoke with three people who lived at the Pineview residence and learned that a fourth resident—TORRES LIZAMA—was not home. The home’s security camera captured a subject walking in the woods in front of the residence at approximately 7:54 p.m.; a minute later, at approximately 7:55 p.m., three gunshots were heard, followed shortly afterwards by the sound of a car accelerating away from the scene.

12. In canvassing the area for witnesses, one witness told law enforcement that he heard approximately three to four gunshots and then saw a blue car drive away. Another witness said that she saw a blue four-door car arrive and a Hispanic female between 18 and 23 years old exit the car. She then heard three gunshots before she saw another person, whom she described as a female, enter the blue car and drive away. Police learned that A.P. drove a blue Hyundai Elantra that was registered to her mother.

13. Police searched the blue iPhone recovered from A.P.'s pocket and determined that A.P. was the user of that phone. Police recovered the phone messages that A.P. sent and received via Facebook Messenger. As relevant here:

- a. On or about July 18, 2024, A.P. sent a message to an individual stating that she was going to Manassas to buy \$200 worth of "Per30" pills. Based on my training and experience, I know that "Per30" pills are 30 milligram oxycodone pills.
- b. In a message A.P. received on July 16, 2024, an individual with the moniker "Tavares Duende" provided his address as 10704 Pineview Road, Manassas, Virginia. Police determined that A.P. entered that same address into her phone's map application at approximately 7:26 p.m., on July 18, 2024. Additionally, A.P.'s phone contained audio messages from "Tavares Duende" sent on July 18, 2024, indicating that he was outside and giving A.P. directions to his location. "Tavares Duende" is captured on one of those messages, sent approximately five minutes before the shooting, telling A.P. that she just passed his street and instructing her to turn around.

14. On July 23, 2024, police executed a search warrant for the Pineview residence. In the room identified by at least one of the residents as being TORRES LIZAMA's room, police located a wallet containing an identification card for TORRES LIZAMA from the Republic of El Salvador, multiple documents containing TORRES LIZAMA's name, and several rounds of ammunition, including 22 12-gauge shotgun shells manufactured by Federal Ammunition, four rounds of .22 caliber ammunition manufactured by Remington, and 43 rounds of 9x19mm ammunition manufactured by CCI (stamped Blazer).¹ The rounds of 9x19mm ammunition manufactured by CCI (stamped Blazer) were similar to the Blazer 9mm cartridge casings found near A.P.'s body. TORRES LIZAMA's father, brother, his father's girlfriend, and her children were present in the residence. Three residents of 10704 Pineview Road identified the voice of the male in the audio recordings sent to A.P. from "Tavares Duende" as belonging to TORRES LIZAMA and identified 703-728-9736 as TORRES LIZAMA's phone number. Additionally, one of the three advised that "Duende" is a name used by TORRES LIZAMA.

15. On or about July 25, 2024, police located A.P.'s blue Hyundai Elantra abandoned in front of 6272 Centreville Road in Centerville, Virginia, an approximate 30-minute drive from the location of A.P.'s murder.

16. Police served a search warrant on T-Mobile for historical cell site location information for telephone facility number 703-728-9736, the number identified by multiple residents of the Pineview residence as belonging to TORRES LIZAMA. According to the records obtained from T-Mobile, TORRES LIZAMA's telephone was in the area of 10704 Pineview

¹ After speaking with several of the home's residents on the day of the shooting, police understood them to have indicated that TORRES LIZAMA resided in the basement. On the day the search warrant was executed, at least one of those residents made clear that the room where the above-referenced items were found was, in fact, where TORRES LIZAMA had been residing.

Avenue at the time A.P. was shot. The device then travelled north along Route 28 into Centerville. Use of the telephone facility discontinued shortly after A.P.'s murder. The movement of the device is consistent with the route from the scene of A.P.'s murder to the location in Centerville where her car was recovered.

17. Police obtained a search warrant for the "Tavares Duende" Facebook account used to communicate with A.P. prior to her murder. According to Meta, the account was registered on March 9, 2024, and A.P. is listed as a friend of the account. The account was used to visit A.P.'s Facebook page on July 16, 2024. The account user listed a town in El Salvador as his hometown and a date of birth. TORRES LIZAMA was born in El Salvador, and his date of birth is within one day of the date of birth listed for the user. Moreover, records obtained from Meta revealed that the account had been accessed around the time of the murder from an IP address tied to the Pineview residence.

18. On or about July 23, 2024, police obtained from the Prince William County, Virginia, General District Court a warrant charging TORRES LIZAMA with second degree murder. On or about September 17, 2024, police arrested TORRES LIZAMA in Lynn, Massachusetts.

19. An ATF Firearms Nexus Expert examined the twenty-two 12-gauge shotgun shells manufactured by Federal Ammunition, four rounds of .22 caliber ammunition manufactured by Remington, forty-three rounds of 9x19mm ammunition manufactured by CCI (stamped Blazer) seized from TORRES LIZAMA's room and determined each of the items are defined as "ammunition" within the meaning of 18U.S.C. § 921(a)(17)(A). The Firearms Nexus Expert also determined that none of the ammunition seized from TORRES LIZAMA's room was

manufactured in the Commonwealth of Virginia. Thus, the ammunition travelled in and affected interstate commerce prior to the date on which TORRES LIZAMA possessed it.

TORRES LIZAMA's Immigration Status

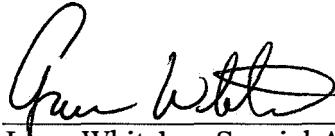
20. On July 22, 2021, a U.S. Border Patrol Agent encountered TORRES LIZAMA in the Rio Grande Valley Border Sector in Texas and determined that TORRES LIZAMA had unlawfully entered the United States from Mexico. TORRES LIZAMA subsequently admitted that he was a citizen and national of El Salvador without the necessary legal documents to enter, pass through, or remain in the United States. TORRES LIZAMA further admitted to illegally crossing the international boundary without being inspected by an immigration officer at a designated Port of Entry. TORRES LIZAMA was thereafter served with a Notice to Appear to show cause why he is not subject to removal from the United States pursuant to Section 212(a)(6)(A)(i) of the Immigration and Nationality Act.

21. I have conducted a search of U.S. Immigration records and have not located any records documenting that TORRES LIZAMA is a U.S. citizen or that he is lawfully present in the United States. Therefore, he is not permitted to possession ammunition pursuant to 18 U.S.C. § 922(g)(5).

CONCLUSION

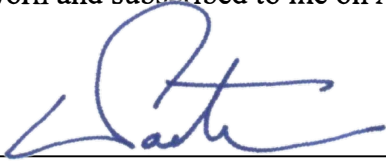
22. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that GERMAN JOSETH TORRES LIZAMA committed unlawful possession of ammunition by an illegal alien, in violation of 18 U.S.C. § 922(g)(5)(a).

Respectfully submitted and attested to in accordance with the requirements of Fed. R. Crim. P. 4.1 via telephone on April 4, 2025.

A handwritten signature in black ink, appearing to read "Jason Whitaker", written over a horizontal line.

Jason Whitaker, Special Agent
Federal Bureau of Investigation

Sworn and subscribed to me on April 3, 2025.

A handwritten signature in blue ink, appearing to read "W. B. Porter", written over a horizontal line.

The Honorable William B. Porter
United States Magistrate Judge